

Eric Croft (Alaska Bar No. 9406031)
THE CROFT LAW OFFICE
738 H Street
Anchorage, AK 99501
T: 907-272-3508 | F: 907-274-0146
eric@croftlawoffice.com

Peter C. Renn (admitted *pro hac vice*)
LAMBDA LEGAL DEFENSE AND EDUCATION FUND, INC.
4221 Wilshire Boulevard, Ste. 280
Los Angeles, CA 90010
T: 213-382-7600 | F: 213-351-6050
prenn@lambdalegal.org

Tara L. Borelli (admitted *pro hac vice*)
LAMBDA LEGAL DEFENSE AND EDUCATION FUND, INC.
730 Peachtree St. NE, Ste. 640
Atlanta, GA 30308
T: 470-225-5341 | F: 404-897-1884
tborelli@lambdalegal.org

Attorneys for Plaintiff Jennifer Fletcher

JAHNA LINDEMUTH
ATTORNEY GENERAL

William Milks (Alaska Bar No. 0411094)
Kevin Dilg (Alaska Bar No. 1406053)
Assistant Attorneys General
Department of Law
P.O. Box 110300
Juneau, AK 99801
Telephone: (907) 465-3600
Facsimile: (907) 465-2075
Email: bill.milks@alaska.gov

Attorneys for Defendant State of Alaska

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

JENNIFER FLETCHER,

Plaintiff,

v.

THE STATE OF ALASKA,

Defendant.

Case No. 1:18-cv-00007-HRH

**JOINT MOTION FOR ENTRY OF
STIPULATED PROTECTIVE
ORDER**

The parties, pursuant to Fed. R. Civ. P. 26 (c) and D.Ak. L.R. 37.1, jointly move the Court for the entry of the parties' proposed Stipulated Protective Order, which governs certain confidential information and documents related to this case. The proposed Stipulated Protective Order specifies the conditions under which confidential documents and information in possession of the parties must be exchanged, used, and protected in this litigation, and authorizes the parties to disclose that information in furtherance of this litigation. The proposed Stipulated Protective Order is justified by Rule 26(c) of the Federal Rules of Civil Procedure and is necessary in order for the parties to timely proceed with discovery.

The Ninth Circuit has affirmed "district courts have broad latitude to grant protective orders to prevent disclosure of materials for many types of information, including, but not limited to, trade secrets or other confidential research, development, or commercial information." *Phillips ex rel. Estates of Byrd v. General Motors Corp.*, 307 F.3d 1206, 1210-11 (9th Cir. 2002). This case involves, among other things, issues related to Plaintiff's medical information. Recognizing the inherently sensitive nature of confidential information such as this, the parties have agreed to a procedure for handling such information as set forth in the Stipulated Protective Order accompanying this Motion. The parties accordingly move this Court to exercise its "wide

discretion in controlling discovery,” and enter their accompanying proposed Stipulated Protective Order. *Jeff D. v. Otter*, 643 F.3d 278, 289 (9th Cir. 2011) (quoting *Little v. City of Seattle*, 863 F.2d 681, 685 (9th Cir.1988)).

Dated: September 28, 2018

/s/ Peter C. Renn

Peter C. Renn (admitted *pro hac vice*)
Tara L. Borelli (admitted *pro hac vice*)
Eric Croft (Alaska Bar No. 9406031)

Attorneys for Plaintiff Jennifer Fletcher

/s/ Kevin M. Dilg

William E. Milks (Alaska Bar No. 0411094)
Kevin M. Dilg (Alaska Bar No. 1406053)
Assistant Attorneys General
Department of Law

Attorneys for Defendant State of Alaska

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, causing a copy of the foregoing and all attachments to be served on all counsel of record.

/s/ Peter C. Renn

Peter C. Renn (admitted *pro hac vice*)

LAMBDA LEGAL DEFENSE AND EDUCATION
FUND, INC.

4221 Wilshire Boulevard, Suite 280

Los Angeles, CA 90010

Telephone: 213-382-7600

Facsimile: 213-351-6050

prenn@lambdalegal.org